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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO QUESTION 4 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

The United States Postal Service hereby files the following institutional response to Question 4, submitted as part of Presiding Officer's Information Request No. 4, dated February 21, 2012, and redirected from witness Neri:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO PRESIDING OFFICER'S INFORMATION REQUEST No. 4, QUESTION 4, REDIRECTED FROM WITNESS NERI

4. [Assuming] that average machine throughput was used to determine the number of machines needed to process mail at modeled locations, [f]or each facility, by operation, please provide the current operating window and the average throughput for each machine used in the operation.

RESPONSE:

The assumption is correct. Average throughputs for each machine in each operation by day, as well as the total time spent processing within that operation, are being filed as library reference USPS-LR-N2012-1/69. That information, while useful to analysis of the present network and how best it might change pursuant to the current proposals, does not project to the future. Proposed operating windows (described in witness Neri's testimony), elimination of the need to await arrival of overnight mail before processing, and substantial overall reduction in processing equipment while retaining more efficient pieces, together signal fundamental changes in operations which suggest that current throughput rates are in no way indicative of future throughputs. The Postal Service, however, currently has no estimates for these expected gains.